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18 Attorneys for Defendant  
19 LIBERTY LIFE ASSURANCE COMPANY OF  
20 BOSTON

21 UNITED STATES DISTRICT COURT  
22 NORTHERN DISTRICT OF CALIFORNIA

23 TERREL HOFFMAN,

24 Plaintiff,

25 v.

26 LIBERTY LIFE ASSURANCE  
27 COMPANY OF BOSTON; SYNOPSY, INC. LONG TERM DISABILITY PLAN,

28 Defendants.

CASE NO. CV 08-00301 JF (HRL)

STIPULATION AND [PROPOSED] ORDER TO CONTINUE CASE MANAGEMENT CONFERENCE

Date: August 15, 2008

Time: 10:30 a.m.

Proposed Date: October 24, 2008

29 IT IS HEREBY STIPULATED by and between plaintiff TERREL HOFFMAN and  
30 defendant LIBERTY LIFE ASSURANCE COMPANY OF BOSTON ("Liberty"), through their  
31 respective attorneys of record, as follows:

32 WHEREAS, this matter was initially set for an Initial Case Management Conference on  
33 May 16, 2008;

34 WHEREAS, the parties had agreed to a private mediation before Vivien Williamson to  
35 RCI/5158641.I/JAW

STIPULATION TO CONTINUE CASE MANAGEMENT CONFERENCE  
CV 08-00301 JF (HRL)

1 occur on July 28, 2008 and therefore, in the interest of efficiency and avoiding potentially  
2 unnecessary expenses, the parties requested that the Initial Case Management Conference be  
3 continued to August 15, 2008;

4 WHEREAS, on May 9, 2008, the Court ordered that the Initial Case Management  
5 Conference be continued to August 15, 2008;

6 WHEREAS, on July 15, 2008, plaintiff filed a Motion For Protective Order and to Quash  
7 Subpoena due to her objections to a subpoena issued by Liberty upon plaintiff's former employer.  
8 The hearing for the motion to quash is currently set for August 19, 2008;

9 WHEREAS, the parties agreed that they would be unable to engage in a meaningful  
10 mediation until plaintiff's motion to quash is heard and therefore, the parties agreed to reschedule  
11 the mediation for September 29, 2008;

12 WHEREAS, the parties believe the Initial Case Management Conference should be  
13 continued to October 24, 2008, or some other convenient date following the scheduled mediation  
14 on September 29, 2008.

15 **IT IS SO STIPULATED.**

16 Dated: July 30, 2008

FLYNN, ROSE & PERKINS

17 By: Charles B. Perkins  
CHARLES E. PERKINS  
Attorneys for Plaintiff  
TERREL HOFFMAN

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19  
20 Dated: July 30, 2008

ROPERS, MAJESKI, KOHN & BENTLEY

21  
22 By: J.A.  
PAMELA E. COGAN  
JENNIFER A. WILLIAMS  
Attorneys for Defendant  
LIBERTY LIFE ASSURANCE  
COMPANY OF BOSTON

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1 **ORDER**

2 The Initial Case Management Conference, currently scheduled for August 15, 2008, is  
3 continued to \_\_\_\_\_ at 10:30 a.m. The parties are directed to file a Case Management  
4 Conference Statement one week prior to the Initial Case Management Conference.

5 **IT IS SO ORDERED.**

6  
7 Dated: \_\_\_\_\_

THE HONORABLE JEREMY D. FOGEL

Ropers Majeski Kohn & Bentley  
A Professional Corporation  
Redwood City

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